

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VANGUARD IDENTIFICATION SYSTEMS,
INC.,

Plaintiff,

CIVIL ACTION
NO. 02-CV-02943 (JPF)

v.

RONNIE E. GOADE, SR., individually and as
Trustee for the RONNIE E. GOADE, SR.

REVOCABLE TRUST, RONNIE E. GOADE, SR.
REVOCABLE TRUST, and REG OKLAHOMA
ACQUISITIONS, LLC,

Defendants.

**UNOPPOSED MOTION FOR ADMISSION *PRO HAC VICE* OF MARC L. ZAKEN AND
JOHN G. STRETTON AND UNOPPOSED MOTION TO ALLOW JAMES C. MCMILLIN TO
WITHDRAW AS COUNSEL FOR DEFENDANTS**

Greg A. Rowe, a member of the Bar of this Court, and counsel for Ronnie E. Goade, Sr., the Ronnie E. Goade, Sr. Revocable Trust, and REG Oklahoma Acquisitions, LLC ("Defendants"), in the above captioned matter, hereby moves for the admission *pro hac vice* of Marc L. Zaken and John G. Stretton, member and associate, respectively, of the law firm of Edwards & Angell, LLP, Three Stanford Plaza, Suite 1310, Stamford, CT 06901, as counsel for the Defendants in the above-captioned matter. In support of this Unopposed Motion, the declaration of Greg A. Rowe is attached hereto as Exhibit A. Counsel for plaintiff has stated that plaintiff does not oppose the granting of this Motion.

Additionally, Defendants respectfully request that this Court allow James C. McMillin ("Movant") of McAfee & Taft, A Professional Corporation, in Oklahoma City, to withdraw as counsel in this matter because Defendants have retained new principal counsel to replace him. In support thereof, Defendants submit the following:

1. Mr. McMillin was retained as principal counsel in this matter by the defendants, Ronnie E. Goade, Sr., The Ronnie E. Goade, Sr. Revocable Trust, and REG Oklahoma Acquisitions, LLC (collectively "Defendants"). Mr. McMillin has done so from the inception of this lawsuit through the current date.

2. Defendants have terminated Mr. McMillin's representation in this matter and have retained new principal counsel to represent them in this lawsuit, the law firm of Edwards & Angell, LLP.

3. Counsel of record for the plaintiff has been contacted and does not object to Mr. McMillin's withdrawal from this matter.

WHEREFORE, Defendants respectfully request that Marc L. Zaken and John G. Stretton of the law firm of Edwards & Angell, LLP be admitted *pro hac vice*, and that James McMillin of McAfee & Taft be permitted to withdraw as counsel for Defendants.

A. Richard Feldman, Esquire (41329)
Greg A. Rowe, Esquire (80066)
BAZELON LESS & FELDMAN, P.C.
1515 Market Street, Suite 700
Philadelphia, PA 19102
215-568-1155 (voice)
215-568-9319 (fax)

Dated: August 26, 2003

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REVOCABLE TRUST, and REG OKLAHOMA
ACQUISITIONS, LLC,

Defendants.

ORDER

AND NOW, this _____ day of _____, 2003, upon consideration of Movant's Unopposed Motion for Admission of Marc L. Zaken and John G. Stretton *Pro Hac Vice*, it is hereby ORDERED AND DECREED that Marc L. Zaken and John G. Stretton are admitted *pro hac vice* in this action as counsel for defendants Ronnie E. Goade, Sr., the Ronnie E. Goade, Sr. Revocable Trust, and REG Oklahoma Acquisitions, LLC.

It is further hereby ORDERED James C. McMillin of McAfee & Taft A Professional Corporation is hereby allowed to withdraw as attorney of record for the defendants Ronnie E. Goade, Sr., The Ronnie E. Goade, Sr. Revocable Trust, and REG Oklahoma Acquisitions, LLC and is no longer attorney of record for the defendants.

FULLAM, J.

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REVOCABLE TRUST, and REG OKLAHOMA
ACQUISITIONS, LLC,

Defendants.

**DECLARATION IN SUPPORT OF UNOPPOSED MOTION
FOR ADMISSION *PRO HAC VICE* OF MARC L. ZAKEN AND JOHN G. STRETTON**

Greg A. Rowe, in support of Defendants' Unopposed Motion For Admission *Pro Hac Vice* of Marc L. Zaken and John G. Stretton deposes and says as follows:

1. I am a member in good standing of the Bar of this Court and local counsel for defendants.
2. Marc L. Zaken is a member in good standing in the Bar of the State of Connecticut and the Bar of the State of New York, with no disciplinary or grievance proceedings filed or pending against him, and he has not resigned or been denied admission, reprimanded, suspended or disbarred from the practice of law by this or any other court. Mr. Zaken is admitted to practice before the United States Court of Appeals for the 2nd, 8th, and 11th Circuits, and before the Untied States District Courts for the Southern District of New York, Eastern District of New York, and the District of Connecticut.

3. John G. Stretton is a member in good standing in the Bar of the State of Connecticut with no disciplinary or grievance proceedings filed or pending against him, and he has not resigned

or been denied admission, reprimanded, suspended or disbarred from the practice of law by this or any other court. Mr. Stretton is admitted to practice before the United States Court of Appeals for the 2nd Circuit and the United States District Court for the District of Connecticut.

4. Admission of Marc L. Zaken and John G. Stretton *pro hac vice* in this action, on behalf of the Defendants, will facilitate presentation of the issues for adjudication by the Court. Mr. Zaken and Mr. Stretton are presently acquiring special knowledge with respect to the claims made by the Defendants.

5. If admitted *pro hac vice*, Marc L. Zaken and John G. Stretton will abide by all the rules of this Court, copies of which have been provided to them. I will also be able to provide any assistance regarding the rules and operating procedures of this Court.

Respectfully Submitted,

Greg A. Rowe, Esquire
BAZELON LESS & FELDMAN, P.C.
1515 Market Street, Suite 700
Philadelphia, PA 19102
215-568-1155 (voice)
215-568-9319 (fax)

Dated: August 26, 2003

CERTIFICATE OF SERVICE

I, Greg A. Rowe, hereby certify that on August 26, 2003, a true and correct copy of Defendants' Unopposed Motion for Admission *Pro Hac Vice* of Marc L. Zaken and John G. Stretton and Motion to Allow James C. McMillin to Withdraw as Counsel for Defendants was served via hand delivery, upon:

David J. Perlman, Esquire
Bochetto & Lentz, P.C.
1524 Locust Street
Philadelphia, PA 19102

Greg A. Rowe